

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

\_\_\_\_\_  
This Document Relates To:  
ALL ACTIONS

Case No. 3:23-md-03084-CRB

**JOINT CASE MANAGEMENT STATEMENT**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17<sup>th</sup> Floor (via videoconference)  
Date: June 20, 2025  
Time: 10:00 a.m.

**JOINT CASE MANAGEMENT STATEMENT**

Defendants Uber Technologies, Inc., Rasier, LLC, Rasier-CA, LLC (collectively “Uber”), and Plaintiffs’ Co-Lead Counsel (collectively referred to herein as “the Parties”), respectfully provide this Joint Case Management Conference Statement and Proposed Agenda in advance of the Case Management Conference scheduled for June 20, 2025.

**Proposed Agenda**

**I. Status of Case Filings**

**II. General Discovery Updates**

**III. Pending Motions**

**IV. Bellwether Wave 1 Update**

**V. Next Case Management Conference**

**I. STATUS OF CASE FILINGS**

**1. Number of MDL Case Filings**

As of June 17, 2025 there are 2,293 cases in this MDL, with approximately 64 new filings since the last case management conference.

**2. Status of JCCP**

There are approximately 621 cases pending in the JCCP.

**3. Other Cases and Proceedings**

Defendants have provided a current list of civil actions and government investigations arising from sexual assault on the Uber platform in which Uber is a defendant, attached as Exhibit A.

**II. GENERAL DISCOVERY UPDATES**

The parties continue to engage in robust discovery efforts. Judge Cisneros recently resolved disputes regarding Plaintiffs’ production of social media documents. ECF 3136, 3209, 3230. Judge Cisneros also resolved disputes regarding Uber’s production of case-specific documents and answers to case-specific interrogatories. ECF 3140, 3172, 3216.

The parties have fully briefed a dispute regarding whether Uber will produce the names and contact information for passengers who reported misconduct on the part of drivers at issue. ECF 3074. That issue remains pending before Judge Cisneros.

Uber recently gave notice of its intent to serve subpoenas on PSC and JCCP leadership firms seeking information about third-party litigation funding. ECF 320, 3252, 3253, 3255, 3257, 3258, 3259, 3262, 3263. Plaintiffs anticipate moving to quash these subpoenas.

### III. PENDING MOTIONS

- Uber's Motion to Dismiss Plaintiffs' Bellwether Complaints is fully briefed. ECF 2791 (motion) 3002 (opposition), 3212 (reply).
- Uber's Motion to Transfer will be fully briefed on June 27, 2025. ECF 3020 (motion), 3057 (stipulation regarding briefing schedule), 3254 (opposition).
- Uber's Motion to Enforce the March 26, 2025 Order is fully briefed and set for hearing on July 11, 2025. ECF 3017 (motion), 3120 (opposition).

### IV. BELLWETHER WAVE 1 UPDATE

As the parties informed the Court before the last CMC, it is necessary to move WHB 1486 out of Wave 1. To replace WHB 1486 in Wave 1, Uber selected WHB 823 (sometimes identified on the docket as WHB 832),<sup>1</sup> Case No. 3:24-cv-4900. The parties agree to refer to WHB 823 as the pseudonym going forward, and agree that the Court should set WHB 823 into Wave 1, replacing WHB 1486. The parties agree and recommend the following schedule for WHB 823, which will modify PTO 26 only as it concerns WHB 823.

Event	PTO 26	Joint Proposal for WHB 823
Substantial Completion of Fact Discovery	July 16, 2025	August 8, 2025
Exchange Expert Reports	August 8, 2025	August 20, 2025

<sup>1</sup> Plaintiff's short-form complaint and amended bellwether complaint identified her as WHB 823, but her case is captioned WHB 832. The parties will use WHB 823 going forward.

Rebuttal Expert Reports	September 8, 2025	September 8, 2025
Daubert/dispositive motions	October 8, 2025	October 8, 2025
Oppositions to Daubert and dispositive motions	November 11, 2025	November 11, 2025
Replies in support of any Daubert and dispositive motions	November 24, 2025	November 24, 2025

#### **V. NEXT CASE MANAGEMENT CONFERENCE**

The next case management conference is set for July 25, at 10:00am, via videoconference. ECF 1990.

1 Dated: June 18, 2025

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1 Dated: June 18, 2025

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**FILER'S ATTESTATION**

I, Sarah R. London, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: June 18, 2025

/s/ Sarah R. London  
Sarah R. London